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ATTORNEY FOR JOSEPH DUANE FOLKERTS

IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH DUANE FOLKERTS,

Defendant.

3-18-cr-00319 - JO

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION TO
ALLOW FILING UNDER SEAL**

I, Laurie Bender, P.C., being first duly sworn do hereby declare the following is true and correct to the best of my knowledge:

1. I am court-appointed counsel for the defendant in this matter. I was appointed to represent the defendant pursuant to the Criminal Justice Act, 18 USC §

3006A (e) (2), by the Honorable Robert E. Jones, United States Senior District Judge, effective February 7, 2019.

2. The defendant is accused by way of Superseding Indictment of Racketeering Conspiracy, in violation of 18 U.S.C. §1962(d); Murder in Aid of Racketeering, in violation of 18 U.S.C. §1959(a)(1) and 18 U.S.C. §2; Kidnapping in Aid of Racketeering, Resulting in Death, in violation of 18 U.S.C. §1959(a)(1) and 18 U.S.C. §2; Kidnapping Resulting in Death, in violation of 18 U.S.C. §§1201(a)(1) and 2; and Conspiracy to Commit Kidnapping, Resulting in Death, in violation of 18 U.S.C. §§1201(a)(1) and 1201(c).

3. Mr. Folkerts requests that the defendant's Motion for Review of Detention and Release on Pretrial Pursuant to 18 U.S.C. § 3142 be filed under seal because it relates to records and information that have been produced under a protective order and other confidential information that should not be made public.

4. The Government, represented by AUSA Steven Mygrant, is not opposed to this motion to seal.

5. The above information is true and correct to the best of my information and belief.

Dated this 26th of August 2019.

/s/ Laurie Bender
Laurie Bender, OSB #881570
Attorney for Defendant
JOSEPH DUANE FOLKERTS